

July 8, 2004

MEMORANDUM TO: John N. Hannon, Chief
Plant Systems Branch
Division of Systems Safety and Analysis
Office of Nuclear Reactor Regulation

FROM: Mark G. Kowal, Reactor Systems Engineer **//RA//**
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Office of Nuclear Reactor Regulation

SUBJECT: MEETING SUMMARY FOR JUNE 17, 2004 MEETING BETWEEN THE
NUCLEAR REGULATORY COMMISSION STAFF AND
STAKEHOLDERS REGARDING AN OPTIONAL, RISK-INFORMED
APPROACH FOR RESOLUTION OF THE PWR SUMP BLOCKAGE
ISSUE (GSI-191) (TAC NO. MA6454)

On June 17, 2004, the Nuclear Regulatory Commission (NRC) staff met with the Nuclear Energy Institute (NEI), utility groups, and other stakeholders at NRC Headquarters concerning an alternate, risk-informed approach for resolving Generic Safety Issue (GSI) 191, "Assessment of Debris Accumulation on [Pressurized-Water Reactor] PWR Sump Performance." Attachment 1 lists the meeting attendees.

The purpose of the meeting was to continue discussions between the NRC staff, NEI, and industry regarding a risk-informed option for resolving GSI-191, and to reach consensus on a path forward.

This was a Category 2 Meeting. A public meeting notice was issued on June 9, 2004, and was posted on the NRC's external (public) web page (ADAMS Accession No. ML041550817). At the conclusion of the business portion of the meeting, the public was invited to participate in this meeting and ask questions of the NRC staff or make comments that they felt were appropriate.

Attachment 2 contains a copy of the public meeting agenda. The main points of the meeting included (1) opening remarks and introductions, (2) NRC proposal and comments, (3) NEI/Industry proposal and comments, (4) open discussion of risk-Informed approaches, and (5) questions from stakeholders.

Attachment 3 contains the NRC staff presentation, "Public meeting with NEI and Industry - An Optional, Risk-Informed Approach For Resolution of the PWR Sump Blockage Issue (GSI-191)."

The NRC staff stated that they would consider an approach involving risk-informed exemption requests in accordance with current regulations. Licensee's could request, on a plant specific basis, exemptions from the requirement to consider the design-basis loss of coolant accident (LOCA) equivalent in size to a double ended rupture of the largest pipe in the reactor coolant system for demonstrating long-term core cooling capability (10 CFR 50.46 (b)(5)). For such an approach, licensee's would need to perform a design basis long-term cooling evaluation and

satisfy the design basis criteria for all breaks up to a new break size ("debris generation break size") that may be less than a double ended guillotine break (DEGB) of the largest pipe in the reactor coolant system. Long-term cooling must be assured for breaks between the debris generation break size and the DEGB, but the evaluation may use a realistically conservative evaluation rather than a design basis evaluation consistent with the small likelihood of the break occurring. The assurance of long-term cooling coupled with the likelihood of the break would be addressed in a risk-informed exemption request that fully meets the requirements of Regulatory Guide 1.174 (risk-informed licensing submittals) and NUREG-0800 - Standard Review Plan Sections 19 and 19.1. This approach was the same as presented by the staff at the May 25, 2004 public meeting (ML04167606).

The staff also discussed and provided its position on the key differences between the NRC and NEI proposals offered at the May 25 meeting. Other items discussed at the meeting included risk calculation methodology and the need for exemption requests. Both NRC and NEI staff left the meeting with a better understanding of each other's proposal.

NEI committed to providing the staff additional information, and the staff agreed to consider the NEI proposal and schedule a follow-up public meeting to continue discussions on a risk-informed approach.

Seven comments were received from public attendees at the meeting. All comments were addressed directly by meeting attendees.

Action items identified during the meeting were as follows:

NEI - Agreed to incorporate additional information and clarifications into Chapter 6 of their submittal to NRC, but could not commit to an aggressive schedule. NEI agreed to provide an update on progress at a future public meeting to be scheduled in the next two weeks (date chosen - June 29, 2004).

NEI - Will clarify information required to resolve questions brought up in the meeting regarding the risk informed approach. Responses to OGC comments would be incorporated into the revised Chapter 6 referenced above.

NRC - Will schedule another public meeting to continue discussions with NEI on use of a risk-informed approach. A date of June 29, 2004 was chosen for this meeting. This will be confirmed by NRC when final arrangements and announcements are made.

In closing the meeting, the NRC staff notified the participants of the NRC Public Meeting Feedback form and encouraged them to complete the form and mail it into the NRC.

Attachments: As stated

DISTRIBUTION: See next page

ADAMS Accession Nos. ML041890452 (Meeting Summary)
 ML041890528 (Attachment 3)
 ML041890541 (Package)

OFFICE	DSSA/SPLB	DSSA/SPLB	DSSA/SPLB
NAME	MKowal	DSolorio	JHannon
DATE	7/08/04	7/19/04	7/20/04

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OPA	
RCaruso	
BPJain	
ACRS	
PMNS	
OGC	
OIG	
WKemper	
Tmensah	
BJasinski	

LIST OF ATTENDEES
MEETING REGARDING AN OPTIONAL, RISK-INFORMED APPROACH FOR
RESOLUTION OF THE PWR SUMP BLOCKAGE ISSUE (GSI-191,
"ASSESSMENT OF DEBRIS ACCUMULATION ON PWR SUMP PERFORMANCE"
THURSDAY, JUNE 17, 2004

<u>NAME</u>	<u>ORGANIZATION</u>
M. Kowal	NRC/NRR/DSSA
M. Marshall	NRC/NRR/DLPM
M. Johnson	NRC/NRR/DSSA
R. Architzel	NRC/NRR/DSSA
D. Solorio	NRC/NRR/DSSA
D. Harrison	NRC/NRR/DSSA
M. Rubin	NRC/NRR/DSSA
J. Hannon	NRC/NRR/DSSA
B. Jasinski	NRC/NRR
M Mitchell	NRC/DE/EMCB
J. Tsao	NRC/DE/EMCB
J. Uhle	NRC/NRR/DSSA
A. Fernandez	NRC/OGC
D. Cullison	NRC/NRR/DSSA
T. Hafera	NRC/NRR/DSSA
S. Dolley	McGraw Hill
D. Lochbaum	Union of Concerned Scientists
J. Butler	Nuclear Energy Institute
A. Pietrangelo	Nuclear Energy Institute
M. Schoppman	Nuclear Energy Institute LATF
B. Jaquith	Westinghouse
P. Salas	TVA
M. Kostelnik	Constellation Energy Group
B. Lutz	Westinghouse
M. Kai	Dominion Resources
A. Wyche	SERCH Licensing/Bechtel
E. Carmack	Stone and Webster
A. Singh	Sargent and Lundy
G. Sowers	APS

NRR = Office of Nuclear Reactor Regulation
DLPM = Division of Licensing Project Management
DSSA = Division of Systems Safety and Analysis
DRIP = Division of Regulatory Improvement Programs
RES = Office of Nuclear Regulatory Research
DET = Division of Engineering Technology
ACRS = Advisory Committee for Reactor Safeguards
OIG = Office of the Inspector General

AGENDA FOR JUNE 17, 2004, PUBLIC MEETING
WITH THE NUCLEAR ENERGY INSTITUTE (NEI) REGARDING
AN OPTIONAL, RISK-INFORMED APPROACH FOR RESOLUTION OF GSI-191

<u>TOPIC</u>	<u>PRESENTER</u>	<u>TIME</u>
Opening Remarks, Introductions	NRC and NEI	1:00 P.M.
NRC Proposal/Comments	NRC	1:15 P.M.
NEI Proposal/Comments	NEI	2:00 P.M.
Open Discussion	NRC and NEI	2:45 P.M.
Questions to NRC from Stakeholders	Stakeholders and NRC	3:30 P.M.
Adjourn		4:00 P.M.

Meeting Purpose: The purpose of the meeting is to continue discussions between the staff, NEI and industry regarding a risk-informed option for resolving GSI-191, and to reach consensus on a path forward.